

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
)
vs.) NO. 04-CR-30055
)
KACEY JONES)

MOTION FOR COURT ORDER TO RECEIVE MENTAL HEALTH/MEDICAL RECORDS

Now comes the defendant and respectfully requests this Honorable Court order the Hampden County House of Correction provide counsel with copies of all reports relative to the defendant's medical and/or psychiatric/psychological examinations conducted while the defendant was housed in the Hampden County House of Correction during 2004 and 2005.

As grounds for this request counsel states he was recently provided with discovery which indicates in March 2005 the defendant was found to be injuring himself in a cell and reporting that he was hearing voices. The records further indicate he was taken to the jail's medical facility to be evaluated by the forensic department.

Counsel asks that by allowance of this motion to have the force and effect of a Court Order so that production of the records may be compelled if necessary.

Respectfully submitted,

DEFENDANT

BY: /s/ Mark G. Mastroianni
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CERTIFICATE OF SERVICE

I, Mark G. Mastroianni, Esq., do hereby certify that I have served a copy of the foregoing to United States Attorney Paul Smyth, 1550 Main Street, Room 534, Springfield, MA 01103 this _____ day of December 2005.

/s/ Mark G. Mastroianni

